

IN THE DISTRICT COURT OF THE UNITED STATES

for the Western District of New York

**JANUARY 2020 GRAND JURY
(Impaneled 01/03/2020)**

THE UNITED STATES OF AMERICA

-vs-

INDICTMENT

PAUL E. LUBIENECKI

Violation:

Title 18, United States Code, Section
2261A(2)
(1 Count)

**COUNT 1
(Stalking)**

The Grand Jury Charges That:

From on or about August, 20, 2019, to on or about February 4, 2020, in the Western District of New York, the defendant, **PAUL E. LUBIENECKI**, with the intent to harass and intimidate another person, that is, Victim 1, a person known to the Grand Jury, did use an electronic communication service, an electronic communication system of interstate commerce, and a facility of interstate and foreign commerce to engage in a course of conduct that placed Victim 1 in reasonable fear of death and serious bodily injury to Victim 1, and caused, attempted to cause, and would be reasonably expected to cause, substantial emotional distress to Victim 1.

All in violation of Title 18, United States Code, Sections 2261A(2)(A) and 2261A(2)(B).

DATED: Buffalo, New York, June 2, 2020.

JAMES P. KENNEDY, JR.
United States Attorney

BY: S/AARON J. MANGO
Assistant United States Attorney
United States Attorney's Office
Western District of New York
138 Delaware Avenue
Buffalo, New York 14202
(716) 843-5882
aaron.mango@usdoj.gov

A TRUE BILL:

S/FOREPERSON